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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

J.N. FILED
JUL 3 2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

SQUARE D COMPANY and SCHNEIDER
ELECTRIC, S.A.,

Plaintiffs,

v.

ELECTRONIC SOLUTIONS, INC. and
WILLIAM AMBROS,

Defendants.

CASE NO. 07 C 6294

Judge James B. Moran

DECLARATION OF WILLIAM AMBROS

I, William Ambros, being duly sworn on oath, depose and state as follows:

1. I currently reside in Plant City, Florida. I am the Director of ESI of Central Florida, Inc., incorrectly sued in this action as Electronic Solutions, Inc. (collectively "ESI"). ESI maintains a facility at 2711 Airport Road, Plant City, Florida.

2. I agreed to be bound by the Consent Order for Preliminary Injunctive Relief ("Consent Order") executed on my behalf by my former counsel Riccardo A. DiMonte and entered in this action on February 11, 2008.

3. I understood from the terms of the Consent Order and from my former counsel that I could recommence selling products bearing Plaintiffs' trademarks ("Square D products") after February 29, 2008. At no time did I believe I was in violation of the Consent Order by selling Square D products.

4. On February 13, 2008 I provided my former counsel with a handwritten list of all Square D products in inventory at the ESI facility, as well as additional documents evidencing

my purchase of certain Square D products. Twenty-six (26) Square D parts were listed on the inventory I prepared on February 13, 2008.

5. On April 30, 2008 four individuals including Plaintiffs' attorney inspected the inventory at the ESI facility. I placed the twenty-six (26) Square D parts listed on the February 13, 2008 inventory list on a table for inspection. Additionally, I showed the individuals the shelves on which I store inventory and I showed them electrical parts that I purchased from China that were not Square D parts. I showed the individuals making the inspection all parts in ESI's inventory on April 30, 2008.

6. I did not interpret the Consent Order to require me to produce hard copies of purchase and sale records at the inspection on April 30, 2008. I understood the Consent Order to require that I produce physical inventory during the inspection.


7. I also did not interpret the Consent Order to require me to produce electronic or computer records at the inspection on April 30, 2008. I informed my counsel prior to the inspection that I did not have electronic or computer records responsive to Plaintiffs' request for that information.

8. I am not currently offering Square D products for sale through ESI or on any website.

Further affiant sayeth not. I affirm, under the penalties for perjury, that the foregoing representations are true.

SUBSCRIBED AND SWORN TO
Before me this 1st day of July, 2008.


Notary Public


William Ambros



SHERYL M. TODD
MY COMMISSION # DD 401061
EXPIRES: March 4, 2009
Bonded Thru Budget Notary Services